

ATTACHMENT D

1995 SATELLITE COSTS

Country	Circuits*	Foreign Cost/ Circuit/Mo***	Foreign Total Cost	AT&T Cost/ Circuit/Mo****	AT&T Total Cost	Orig.+Term Minutes ****	Foreign Cost/Min	AT&T Cost/Min
Pakistan	479	\$228	\$1,310,544	\$350	\$2,011,800	74484120	\$0.018	\$0.027
Honduras	390	\$228	\$1,067,040	\$350	\$1,638,000	54250525	\$0.020	\$0.030
Nicaragua	270	\$228	\$738,720	\$350	\$1,134,000	32275779	\$0.023	\$0.035
Guyana	269	\$296	\$955,488	\$350	\$1,129,800	61235901	\$0.016	\$0.018
Kenya	66	\$228	\$180,576	\$350	\$277,200	11453830	\$0.016	\$0.024

* Source: 1995 AT&T Annual Circuit Status Report, Filed with FCC April 1, 1996

*** Source: AT&T Global Network Engineering, AT&T Network Operations

**** Source: FCC 1995 43.61 (Preliminary)

Earth station costs are not included.

ATTACHMENT E

AT&T'S ESTIMATED AVERAGE WORLDWIDE NETWORK TERMINATION COST

AT&T's total international average estimated network termination cost of \$0.075 per minute includes three components: (1) international half-channel or "wet link" cost; (2) gateway switching and interexchange network or "dry link" cost; and (3) local distribution or "access charges. Below is a description of these components:

International Half-Channel or "Wet Link"

This includes expenses representing the allocation of the cost of property, plant and equipment over its estimated useful life. Property, plant and equipment pertain to the undersea fiber optic cable up to and including the cable landing station and the portions of the satellite earth station equipment used for international telephony. Also included are the expenses associated with management of the international facilities, maintenance and repair of submarine cables, satellite rent payments and leased transit expenses (between a foreign cable landing point and the terminating carrier), where applicable.

Gateway Switching and Interexchange Network or "Dry Link"

This includes expenses representing the allocation of the cost of property, plant and equipment over its estimated useful life. Property, plant and equipment pertain the domestic facilities and switching equipment from the LEC-facing point of presence up to and including the international switching center. Also included are the following: (1) administration expenses associated with the design, provision and management of network facilities; 2) maintenance expenses associated with keeping property, plant and equipment at a certain standard of operating condition; 3) research and development and right-to-use fees associated with switching and facilities used in the interexchange domestic network.

Local Distribution or "Access Charges"


This is the composed of the weighted average of the tariff charges paid to local operating telephone companies or alternate access providers for switched and dedicated access for terminating international telephone calls. Obviously, carriers that self-provision local access have significantly lower costs -- such as U.S. local carriers and most foreign companies.

Estimated Average Cost per Minute

The total of \$0.075 per minute is the estimated average cost per minute to terminate incoming international telephone calls on AT&T's network. The various cost components are weighted by country to reflect the mix of network configurations and equipment used over AT&T's international network.

CERTIFICATE OF SERVICE

I, Helen Elia, do hereby certify that on this 7th day of February, 1997 a copy of the foregoing "Comments of AT&T " was mailed by U.S. first class mail, postage prepaid, upon the parties on the attached service list:


Helen Elia

* By hand delivery

SERVICE LIST

Dr. James E. Soos, Deputy Asst.
Secretary of Defense
Room 3E
6000 Defense Pentagon
Washington, DC 20301-6000

Carl Wayne Smith, Esq.
Code AR Defense Information
Systems Agency
701 South Courthouse Road
Arlington, VA 22204

Office of General Counsel
National Security Agency
9800 Savage Road
Fort Meade, MD 20755-6000

Ambassador Vonya B. McCann
United States Coordinator
International Communication
and Information Policy
Department of State
Room 4826
2201 C Street, N.W.
Washington, D. C. 20520

Cathleen Wasilewski
Attorney Advisor, Office of
Chief Counsel
Department of Commerce
Room 4713
14 St. & Constitution Ave, NW
Washington, D.C. 20230

Richard Beaird
Bureau of International
Communications and
Information Policy
Department of State
Room 4836
2201 C Street, N.W.
Washington, DC 20520-1428

Steven Lett
Bureau of Int'l Communications
and Information Policy
Department of State
Room 4826
2201 C Street NW
Washington, D.C. 20520

Suzanne Settle
Senior Policy Advisor
NTIA
Department of Commerce
Room 4701
14th St. & Constitution, N.W.
Washington, D.C. 20230

Anthony Cina
Bureau of International
Communications and Information
Policy
Department of State
Room 4826
2201 C Street, N.W.
Washington, D.C. 20520

Gary Couey
Bureau of International
Communications and Information
Policy
Department of State
Room 4826
2201 C Street, N.W.
Washington, D.C. 20520

Larry Irving
Assistant Secretary for
Communications & Inform.
NTIA
Department of Commerce
Room 4898
14th St. & Constitution N.W.
Washington, D.C. 20230

Jack Gleason
Acting Administrator
Office of International Affairs
Room 4701
14th St. & Constitution N.W.
Washington, D.C. 20230

Robin R. Layton
ITA
Department of Commerce
Room 4324
14th St. & Constitution, N.W.
Washington, D.C. 20230

Barbara Wellberry
Chief Counsel
Department of Commerce - NTIA
Room 4713
14th St & Constitution Ave, N.W.
Washington, D.C. 20230

Robert S. Koppel
VP - Legal & Regulatory
Affairs
IDB Worldcom
15245 Shady Grove Road
Suite 460
Rockville, MD 20850-3222

Jack Scorce, Esq.
MCI International, Inc.
1801 Pennsylvania Ave, N.W.
Washington, DC 20006

Gail Polivy, Esq.
GTE Hawaiian Telephone
Company
1850 M Street, N.W.
Suite 1200
Washington, DC 20036

Keith H. Fagan
COMSAT Communications
6560 Rockspring Drive
Bethesda, MD 20817

Michael Fingerhut
Sprint Communications
Company L.P.
1850 M Street, N.W.
11th Floor
Washington, DC 20036

John Dalton
Secretary of the Navy
Office of the Secretary
Department of the Navy
The Pentagon
Washington, D.C. 20310